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International Alliance of Theatrical Stage Employees
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States and Canada Local 720 Pension Trust*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NEVADA RESORT ASSOCIATION –
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA LOCAL 720 PENSION
TRUST,

Plaintiff,

vs.

JB VIVA VEGAS, L.P.,

Defendant.

JB VIVA VEGAS, L.P.,

Counterclaimant,

vs.

CASE NO.: 2:19-cv-00499-JAD-DJA

**STIPULATION AND ORDER TO EXTEND
DEADLINE TO FILE OPPOSITIONS TO
MOTIONS FOR SUMMARY JUDGMENT**

[FIRST REQUEST]

NEVADA RESORT ASSOCIATION –
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES
AND MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA LOCAL 720 PENSION
TRUST,

Counterdefendant.

Plaintiff Nevada Resort Association-International Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the United States and Canada Local 720 Pension Trust (the “Trust”) and Defendant JB Viva Vegas, L.P. (“JB”) (collectively “the Parties”) hereby stipulate and request an order extending the deadline from October 11, 2019, to October 25, 2019, to file the parties’ respective oppositions to motions for summary judgment.

On July 8, 2019, the Parties jointly submitted a proposed scheduling order requesting a special scheduling review, in which the Parties agreed that only dispositive motions were needed in this case. (ECF No. 15.) On July 11, 2019, this Court granted the Parties’ proposed scheduling order and scheduled dispositive motions to be filed by August 26, 2019. (ECF No. 16.)

On August 15, 2019, the Parties stipulated and filed their first request to extend the dispositive motion deadline. (ECF No. 21.) The Court granted their request. (ECF No. 22, filed Aug. 19, 2019.) On September 3, 2019, the Parties stipulated and filed a second request to extend the dispositive motion deadline until September 20, 2019. (ECF No. 23). The Court also granted this request. (ECF No. 24, filed Sep. 5, 2019.) On September 20, 2019, the Parties filed their respective Motions for Summary Judgment. (ECF Nos. 25 and 26.)

The Parties now respectfully request an extension of two weeks to submit Oppositions and Replies related to the Motions for Summary Judgment. The Parties’ counsel’s professional obligations have been unusually demanding, and some of the obligations were unforeseen. Moreover, MPPAA, the associated withdrawal liability rules and the issues present in this case are notably complex. Both Parties request the extension so to accurately and fully respond to the arguments presented to this Court. While the Parties understand that they have received extensions to the briefing schedule in the past, this case only requires dispositive motions, and the

1 Parties therefore agree that neither Party will be prejudiced by the small amount of additional
2 time.

3 The parties therefore jointly and respectfully request that the Court approve the following
4 amended briefing schedule:

5 1. The Parties shall have until Friday, October 25, 2019, to file oppositions to
6 dispositive motions.

7 2. The Parties shall have until Friday, November 8, 2019, to file replies in support of
8 dispositive motions.

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1 This request is not being brought for the purpose of delay, but to enable the Parties enough
2 time to properly brief the numerous issues in this matter for this Court.

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4 BROWNSTEIN HYATT FARBER
SCHRECK, LLP

AKIN GUMP STRAUSS HAUER & FELD,
LLP

5
6 /s/ Christopher M. Humes

/s/ Eric Field

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17 *Attorneys for Plaintiffs*

Attorneys for Defendant

18 Dated: September 27, 2019.

Dated: September 27, 2019.

19 **ORDER**

20 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE
Dated: September 30, 2019.